

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., <u>et al.</u>	)	Case No. 01-01139 (JKF)
	)	
Debtors.	)	(Jointly Administered)

**NOTICE OF CONTINUATION OF THE DEPOSITION OF**  
**JOHN C. IRVINE**

To: ASBESTOS PROPERTY DAMAGE CLAIMANTS AND THEIR ATTORNEYS:

PLEASE TAKE NOTICE that the Debtors will continue the deposition upon oral examination of John C. Irvine, before a person authorized to administer oaths, at The Fairmont Winnipeg, 2 Lombard Place, Winnipeg, Manitoba (Canada) R3B 0Y3 on Wednesday, August 29, 2007, commencing at 9:00 AM and continuing from day to day until complete. Mr. Irvine will answer such questions as are propounded to him regarding his expert report entitled "Opinion on Canadian Tort Law as it relates to Economic Loss caused by Defective or Dangerous Products; and as to the Diverse Provincial Limitation Rules governing such claims" and related issues, including any amendments or modifications thereto. The deposition will be stenographically recorded.

The witness is requested to bring with him and produce any and all documents, writings, data and any other information as referred to in the attached list, Exhibit A.

Counsel is hereby invited to appear and take such part in the examination as may be proper.

Dated: August 27, 2007

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By:

  
\_\_\_\_\_  
Co-Counsel for the Debtors and Debtors in  
Possession

**Exhibit A**

1. A current CV.
2. A copy of all materials you considered or relied upon in drafting your expert report entitled "Opinion on Canadian Tort Law as it relates to Economic Loss caused by Defective or Dangerous Products; and as to the Diverse Provincial Limitation Rules governing such claims" ("Expert Report") which was submitted in connection with these Chapter 11 proceedings to counsel for W.R. Grace on or about July 23, 2007 and any amendment, modification or supplementation to said Expert Report.
3. Copies of any and all notes that exist concerning the substance or topic of your Expert Report.
4. Any and all communications between you and any other expert retained or consulted in connection with these Chapter 11 proceedings.
5. Any and all communications, including but not limited to e-mails, concerning any amendment, modification and/or supplement of the Expert Report.